

December 27, 2004

**SFUND RECORDS CTR**  
**2388350**

Alice Gimeno, Senior Hazardous Substances Scientist  
Office of Military Facilities, Southern California Operations  
DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
5796 Corporate Avenue  
Cypress, CA 90630

Re: Victoria Golf Course Site in Carson

Dear Ms. Gimeno:

Thank you for your December 22, 2004 letter (copy attached) to interested parties to the Victoria Golf Course site in Carson, California. Your letter makes a number of points which warrant clarification. It is important that we not overlook some of the data which are available on this project. BKK Corporation hopes this information is helpful.

- ☐ Your letter responds to BKK's statement at the November 5, 2004 meeting that there was a non-BKK operator of landfill operations on a portion of the site. Please note that BKK's statement is supported by the text of two recent DTSC and USEPA documents which were cited and read from at the meeting. *Please confirm that DTSC is pursuing the other operator which was identified by the Department in its own document.*
- ☐ Your letter discounts BKK's assertion at the November meeting that there is a liner beneath the old landfill. Please recall that BKK describes this as a non-engineered liner. The landfill was encircled by a berm and it has a base of fine grained soils which were compacted in place for the very sensible and pragmatic purpose of facilitating multi-season operations in low lying marshland. However, regardless of what is known about the composition of the liner, the bigger issue here is the fact that DTSC's own 1996 data showed the groundwater beneath the landfill to be nondetect for VOCs and semiVOCs, but USEPA's 2000 data are reported to have subsequently shown otherwise. Trash was placed in the landfill between about 1948 and 1959. DTSC's 1996 study used the highly unorthodox method of drilling down through the center of a landfill to collect samples underneath. This may have pushed entombed trash and contaminants from within the landfill down into the water table. *Please propose a model to explain why shallow groundwater directly beneath the landfill was clean for nearly five decades after operations began, but then became contaminated only after DTSC poked holes through the bottom of the landfill in 1996.*
- ☐ Your letter says that DTSC does not believe that wastewaters in the old unlined Dominguez Channel have contributed to contamination on site. This warrants further discussion. It is expected that 1940s and 1950s wastewaters would have had contaminants. Some of those contaminants would have been likely to settle in the sediment on the bottom of the unlined channel. Please recall past

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communications which explain that excavated channel bottom spoils from the project to construct a concrete liner for the channel were spread and left in place on the Victoria Golf Course site. In addition, please recall DTSC's own 1996 data which show that groundwater becomes contaminated only after it passes beneath the channel. The upgradient groundwater was clean. Your own data present a compelling argument that the channel does make a notable contribution to contamination on site. *Please reconcile your opinion on the channel with your 1996 data, and with past records which say that channel bottom spoils were spread across the site.*

A fair understanding of contaminant fate and transport is relevant to site remediation.

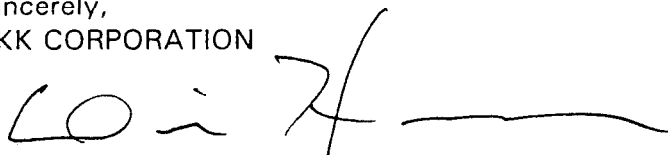
The statements in today's letter are supported by published data and communications. Those documents were either created by or have previously been transmitted to DTSC.

It certainly appears that DTSC needs to pursue the upstream wastewater dischargers to the unlined Dominguez Channel. Moreover, the Department needs to ask those PRPs for sampling data which characterizes their wastewaters (and/or data which supports a claim that wastewaters were neutralized before discharge).

We look forward to receiving a reply to the direct requests made in the three bullet paragraphs of this letter. On other projects DTSC has demanded that certain elements of BKK's technical work be prepared by or under the direction of, and be certified by, a California licensed Professional Engineer, Registered Geologist or other registered professional appropriate to the technical requirements of the work. BKK asks that the Department please hold itself to the same standard. The second and third bullets above relate to DTSC's interpretation of chemical and hydrogeologic data. Please have your interpretation certified and stamped by a P.E., R.G. or other licensed professional.

We hope the foregoing comments are helpful. The ability to reach an agreement on the basic facts and science of the project should present a solid foundation from which to encourage and build future productive dialogue. If you have any questions, please don't hesitate to call me at (626) 965-0911 x361.

Sincerely,  
BKK CORPORATION

A handwritten signature in black ink, appearing to read "C. W. Hansen", followed by a horizontal line.

By: BAS Construction and Remediation, agent for BKK Corporation

By: Christopher W. Hansen, P.E., Vice President  
BAS Construction and Remediation, L.P.

Attachment

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Alice Gimeno, Senior Hazardous Substances Scientist

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cc: Ebby Azizi - Los Angeles CA  
Win Colbert - Goodyear Tire and Rubber, Akron OH  
Margarita Cruz - City of Carson, Carson CA  
Elizabeth Deane - PaulHastings, San Francisco CA  
Robert Elliott - DTSC, Sacramento CA  
Mohammad Estiri - Santa Ana CA  
William Evans - Caltrans, Los Angeles CA  
Brad Frazier - Watson Land Company, Carson CA  
Earl Haberlin - Watson Partners, Wilmington DE  
Larry Hensley - County of Los Angeles, Los Angeles CA  
Kris Kazarian - BKK Corporation, West Covina CA  
Stacey Lear - DTSC, Cypress CA  
Gene Lucero - Latham & Watkins, Los Angeles CA  
Fred Phaeffle - County of Los Angeles, Los Angeles CA  
Sherri Repp - City of Carson, Carson CA  
Dawn Richmond - USEPA, San Francisco CA  
Ken Rogers - Goodyear Tire and Rubber, Gardena CA  
Carlos Ruiz - County of Los Angeles, Alhambra CA  
John Scandura - DTSC, Cypress CA  
Sunni Soltani - Aleshire & Wynder, Irvine CA  
Jan Takata - County of Los Angeles, Los Angeles CA  
Karen Taylor - County of Los Angeles, Los Angeles CA  
Peter Weiner - PaulHastings, San Francisco CA  
William Wynder - Aleshire & Wynder, Irvine CA  
Andrew Yoon - Caltrans, Los Angeles CA  
BKK File  
BAS File



Alan C. Lloyd, Ph.D.  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control

5796 Corporate Avenue  
Cypress, California 90630

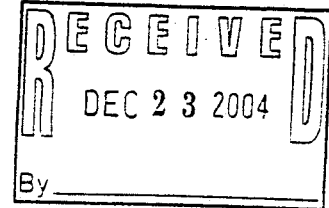
CENTRAL FILE  
Main St Dump



Arnold Schwarzenegger  
Governor

December 22, 2004

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Interested Party Mailing List

### UPDATE MEETING FOR VICTORIA GOLF COURSE LANDFILL CARSON, CALIFORNIA

Dear Interested Party:

The Department of Toxic Substances Control (DTSC) would like to update you on information regarding questions and action items that arose during our November 5, 2004 potentially responsible party (PRP) meeting for the Victoria Golf Course landfill. DTSC would also like to propose a meeting for January 26, 2005 at 10:30 a.m. to get an update from the PRPs, and to discuss information and future actions to take place towards the investigation and remediation of the landfill.

BKK Corporation (BKK) stated during the meeting that the southwestern half of the former BKK landfill in Carson, south of the Dominguez channel, was leased to another party as a public dump and that BKK was not responsible for that dump. Records state that BKK was the owner and operator of the landfill. The 1948 permit has the boundaries listed as, "Between Main Street & Avalon Boulevard and 190<sup>th</sup> Street & Del Amo," which includes property on both sides of the Dominguez channel. As the former operator of the northern portion of the landfill, BKK is a PRP. As the owner of the entire landfill property, which existed on both sides of the Dominguez channel, BKK is a PRP regardless of who operated the landfill.

BKK made statements during the meeting regarding the 1996 groundwater and soil sampling effort conducted by DTSC. BKK stated that any waste in the landfill at that time was encapsulated within the landfill boundaries and this was due to the way BKK compacted native soils prior to disposal, and this acted like a liner. DTSC does not agree that compacted soils acted like a landfill liner. As DTSC stated in the meeting, there was no liner constructed for this landfill. There are no records that state a liner was ever constructed prior to landfill operations, and boring logs from past drilling investigations do not indicate that a liner is present.

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The question of adding additional generators as PRPs was brought up during the meeting. DTSC stated that no landfill disposal records have been acquired that would identify additional PRPs. DTSC requested that Los Angeles County representatives research archive records for the former BKK landfill in an effort to identify additional PRPs. An original condition for the landfill operations required that, "a complete record of each load of chemical and industrial wastes accepted for disposal be submitted monthly to the County Engineer."

The question of possible contributors to the landfill contamination from industrial discharges to the Dominguez Channel was also discussed. While DTSC does not believe the channel contributed to the contamination at the landfill, DTSC is following up on information requests sent to potential channel dischargers and will review any information received. DTSC is also willing to review any information provided by the current PRPs pertaining to this issue.

As mentioned above, DTSC would like to meet with the PRP workgroup on January 26, 2005 at 10:30 a.m. to share information, get an update on the Los Angeles County record search, and discuss the next actions to be taken for the landfill. If you would like to add any specific agenda topics, please let me know. If you have any questions regarding this matter, please contact me at (714) 484-5429.

Sincerely,



Alice Gimeno  
Senior Hazardous Substances Scientist  
Office of Military Facilities  
Southern California Operations

cc: Ms. Dawn Richmond  
Superfund Project Manager  
United States Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, California 94105

Mr. John Scandura, Chief  
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cc: Mr. Robert Elliott  
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Ms. Stacey Lear  
Public Participation Specialist  
Cypress Office

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*INTERESTED PARTY MAILING LIST*

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Chief Administrative Office  
County of Los Angeles  
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Los Angeles, California 90012

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Mr. Carlos Ruiz  
Environmental Program Division  
Los Angeles County Department of Public Works  
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Mr. William Evans  
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✓ Mr. Christopher Hansen  
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xcc: KLL  
P+G  
MEID  
File

CWH  
12/23



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December 22, 2004  
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Mr. Win Colbert  
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Akron, Ohio 44316

Mr. Ken Rogers  
The Goodyear Tire and Rubber Company  
Base Maintenance Administrator  
19200 S. Main Street  
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